

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

TINA RENNA,

*Plaintiff,*

-VS-

THE COUNTY OF UNION,  
NEW JERSEY

*Defendant.*

CASE NO. 11-cv-03328-KM-MAH

## NOTICE OF MOTION FOR COUNSEL FEES

**TO:** Norman W. Albert, Esq.  
Union County Counsel  
Administration Building  
Elizabeth, New Jersey 07207  
Telephone: 908-527-4250  
Facsimile: 908-289-4230  
*Attorneys for Defendant*  
*The County of Union, New Jersey*

**PLEASE TAKE NOTICE** that on July 21, 2014 at 9 a.m. or as soon thereafter as this matter may be heard, Plaintiff Tina Renna shall move the Court pursuant to Fed. R. Civ. P. 54(d) and L. Civ. R. 54.2 for an Order awarding the Plaintiff counsel fees incurred in this action in the amount of \$42,197.50 and costs of \$550.65.

In support of this Motion, Plaintiff relies on the accompanying Brief and Declarations and the Opinion (Doc. 32) and Order and Judgment (Doc. 33) previously entered by this Court in this action.

A proposed form of Order and Declaration of Service are being filed with this Motion.

**LAW OFFICES OF WALTER M. LUERS, LLC**

Dated June 26, 2014

By: /s/ Walter M. Luers  
Walter M. Luers

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